

# Exhibit No. 300

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OPC – Exhibit 300  
Lena M. Mantle Testimony  
Surrebuttal  
File No. EO-2025-0154

**Exhibit No.:** \_\_\_\_\_  
**Issue(s):** Fuel Adjustment Clause (“FAC”)  
**Witness/Type of Exhibit:** Mantle/Surrebuttal  
**Sponsoring Party:** Public Counsel  
**Case No.:** EO-2025-0154

**SURREBUTTAL TESTIMONY**

**OF**

**LENA M. MANTLE**

Submitted on Behalf of the Office of the Public Counsel

**EVERGY METRO, INC. D/B/A  
EVERGY MISSOURI METRO  
AND  
EVERGY MISSOURI WEST, INC. D/B/A  
EVERGY MISSOURI WEST**

CASE NO. EO-2025-0154

September 12, 2025

**SURREBUTTAL TESTIMONY**

**OF**

**LENA M. MANTLE**

**EVERGY METRO, INC. d/b/a EVERGY MISSOURI METRO**

**AND**

**EVERGY MISSOURI WEST, INC. d/b/a EVERGY MISSOURI WEST**

**CASE NO. EO-2025-0154**

1 **Q. Would you state your name?**

2 A. My name is Lena M. Mantle.

3 **Q. Please state your name and business address.**

4 A. My name is Lena M. Mantle and my business address is P.O. Box 2230, Jefferson  
5 City, Missouri 65102. I am a Senior Analyst for the Office of the Public Counsel  
6 (“OPC”).

7 **Q. Please briefly describe your experience and your qualifications.**

8 A. I have been employed by the OPC in my current position since August 2014. In  
9 this position, I have provided testimony and support in electric, natural gas, and  
10 water cases for the Public Counsel. Prior to my employment for the OPC, I worked  
11 for the Staff of the Missouri Public Service Commission (“Staff”) from August  
12 1983 until I retired in December 2012. During the time that I was employed at the  
13 Missouri Public Service Commission (“Commission”), I worked as an Economist,  
14 Engineer, Engineering Supervisor and Manager of the Energy Department.

15 Attached as Schedule LMM-S-1 is a brief summary of my experience with  
16 OPC and Staff along with a list of the Commission cases in which I filed testimony,  
17 Commission rulemakings in which I participated, and Commission reports to which  
18 I contributed. I am a Registered Professional Engineer in the State of Missouri.

19 To provide a basic understanding of the Fuel Adjustment Clause (“FAC”)  
20 as it operates in Missouri, I have attached as Schedule LMM-S-2 to this testimony

1 the whitepaper I authored titled, “Electric Utility Fuel Adjustment Clause in  
2 Missouri: History and Application.”

3 **Q. To what rebuttal filing are you responding?**

4 A. I am responding to the rebuttal *Staff Recommendation Report* (“Staff Report”)  
5 sponsored by Staff witness James A. Busch. Specifically, I am responding to the  
6 “FAC Operation” section beginning on page 64 of the Staff report regarding the  
7 Large Load Power Service (“LLPS”) customers and the FACs of Evergy Metro,  
8 Inc. and Evergy Missouri West, Inc. (collectively “Evergy”). This section of the  
9 Staff Report was written by Staff witnesses Sarah L.K. Lange and Brooke  
10 Mastrogiannis.

11 **Q. Do you agree with Staff witness Sarah Lange that the cost incurred by large  
12 load customers would be subsidized with the FACs?**

13 A. Yes. When a new LLPS customer comes on one of Evergy’s systems, it will  
14 immediately increase the load costs therefore increasing FAC costs unless changes  
15 are made to Evergy’s FAC. After the first accumulation period that includes a new  
16 LLPS customer, the non-LLPS customers will pay for some of these increased costs  
17 through the FAC.

18 Following the first rate case after a LLPS customer is added, if all customers  
19 are included in the FAC, the amount of fuel included in the base rates for the non-  
20 LLPS customers will increase as will the FAC base factor. Non-LLPS customers  
21 will continue to subsidize LLPS customers through the FAC since the increased  
22 FAC costs will be charged all customers.

23 In the first FAC recovery period after a LLPS customer reduces load or  
24 leaves the system, non-LLPS customers will end up paying the extra cost incurred  
25 over the previous accumulation period by the LLPS customer. The subsidization  
26 by non-LLPS customers will not end until all the costs of the LLPS customer has  
27 been paid by the non-LLPS customers.

1 I have attached as Schedule LMM-S-3 a schedule that shows all of these  
2 scenarios.

3 **Q. Will subsidization only occur when a LLPS customer is added or reduces its**  
4 **load?**

5 A. No. Because LLPS customers will only increase FAC costs, the inclusion of the  
6 LLPS load in calculating a base factor in general rate cases would result in all  
7 customers being charged more for fuel and purchased power costs in their base rates  
8 and in the FAC. The non-LLPS customers will be charged this higher average cost  
9 when the average cost for the non-LLPS customers would be lower without the  
10 LLPS customer loads.

11 **Q. What do you recommend that would minimize the subsidization of the LLPS**  
12 **customers through Evergy's FACs?**

13 A. I recommend that there be two FACs – one for the LLPS customers and one for the  
14 non-LLPS customers. This would also result in lower FAC base costs being  
15 included in the base rates of non-LLPS customers.

16 **Q. Do you agree with Staff witness Brooke Mastrogiannis that changes to the**  
17 **FAC cannot be made between rate cases?**

18 A. Yes. I am not an attorney but my understanding of Section 386.266.5 RSMo. is that  
19 the FAC cannot be modified except in a general rate proceeding. However, I do  
20 not believe that this prevents a subsequent tariff from removing a customer type  
21 from being included in the FAC calculation. Language could be included in the  
22 LLPS tariff sheet excluding the LLPS customers from the currently effective FAC.  
23 Tracking the costs and revenues associated with fuel and purchased power would  
24 be dealt with as proposed by Ms. Mastrogiannis in the next general rate case.<sup>1</sup> At

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<sup>1</sup> Page 66.

1           that time tariff sheets detailing a FAC for LLPS customers could be proposed and  
2           approved.

3   **Q.    Is Ms. Mastrogiannis' recommendation that the LLPS adjustments be tracked**  
4   **and recorded as a regulatory asset or liability to be dealt with in subsequent**  
5   **rate cases an alternative to your recommendation?**

6   A.    Perhaps. The devil is in the detail, and it would be difficult to design and audit.  
7           Completely exempting the large load customers from Evergy's FAC would remove  
8           the subsidization of LLPS customers in the FAC.

9   **Q.    Does this conclude your surrebuttal testimony?**

10  A.    Yes, it does.

